

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHEVRON CORPORATION,

Plaintiff,

v.

STEVEN DONZIGER *et al.*,

Defendants.

11-CV-0691

The Honorable Lewis A. Kaplan, U.S.D.J.
The Honorable James C. Francis, U.S.M.J.

DECLARATION OF STEVEN R. DONZIGER
IN SUPPORT OF DEFENDANTS' MOTION FOR AN ORDER TO SHOW CAUSE WHY
THE COURT SHOULD NOT DISMISS COUNTS 1 AND 2 IN LIGHT OF CHEVRON'S
WAIVER OF ANY CLAIM TO MONEY DAMAGES

I, STEVEN R. DONZIGER, hereby declare under penalty of perjury pursuant to 28 U.S.C.

§ 1746, that the following is true and correct:

I make this declaration in support of Defendants' Motion For An Order To Show Cause Why The Court Should Not Dismiss Counts 1 And 2 In Light Of Chevron's Waiver Of Any Claim To Money Damages. Were Defendants to proceed by regular Notice of Motion, the Court and the parties would be forced to invest resource and wastefully litigate a trial which would change dramatically and necessarily in terms of scope and shape if the motion is granted. Accordingly there is no other option than to proceed by motion for an order to show cause.

Executed on this 10th day of October 2013 at New York, New York.

/s/ Steven R. Donziger
Steven R. Donziger